

Hearing Date: October 15, 2009 at 2:00 p.m. (prevailing Eastern Time)  
Objection Deadline: October 9, 2009 at 4:00 p.m. (prevailing Eastern Time)

William R. Maguire  
Seth D. Rothman  
Neil J. Oxford  
HUGHES HUBBARD & REED LLP  
One Battery Park Plaza  
New York, New York 10004  
(212) 837-6000 (telephone)  
(212) 422-4726 (facsimile)  
[maguire@hugheshubbard.com](mailto:maguire@hugheshubbard.com)

John F. Wood (*pro hac vice* admission pending)  
HUGHES HUBBARD & REED LLP  
1775 I Street, N.W., Suite 600  
Washington, D.C. 20006  
(202) 721-4600 (telephone)  
(202) 721-4646 (facsimile)  
[woodj@hugheshubbard.com](mailto:woodj@hugheshubbard.com)

Attorneys for James W. Giddens, as  
Trustee for the SIPA Liquidation of Lehman Brothers Inc.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:

LEHMAN BROTHERS INC.,

Debtor.

Case No. 08-01420 (JMP) SIPA

**NOTICE OF HEARING ON THE TRUSTEE'S MOTION  
FOR RELIEF PURSUANT TO THE SALE ORDERS OR,  
ALTERNATIVELY, FOR CERTAIN LIMITED RELIEF UNDER RULE 60(b)**

PLEASE TAKE NOTICE that James W. Giddens (the "Trustee"), as Trustee for the SIPA liquidation of Lehman Brothers Inc., by and through his undersigned attorneys, filed a motion (the "Motion") for relief pursuant to the sale orders or, alternatively, for certain limited relief under Rule 60(b) of the Federal Rules of Civil Procedure, as further described in the Motion.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must

(i) be in writing; (ii) state the name and address of the objecting party and nature of the claim or interest of such party; (iii) state with particularity the legal and factual bases of such objection; (iv) conform to the Federal Rules of Bankruptcy Procedure and Local Bankruptcy Rules; (v) be filed with the Bankruptcy Court, together with proof of service, electronically, in accordance with General Order M-242, as amended by General Order M-269 (available at the Court's website, [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Court's Electronic Case Filing System, and by all other parties in interest, on a 3.5 inch disk or CD-ROM, preferably in Portable Document Format (PDF), WordPerfect or any other Windows-based word processing format no later than **October 9, 2009 at 4:00 p.m.** (the "Objection Deadline"); and (vi) served on (a) Hughes Hubbard & Reed LLP, One Battery Park Plaza, New York, New York, 10004, Attn: William R. Maguire, Esq. and Neil J. Oxford, Esq., Counsel to the Trustee; (b) Securities Investor Protection Corporation, 805 Fifteenth Street, N.W., Suite 800, Washington, D.C. 20005, Attn: Kenneth J. Caputo, Esq., Senior Associate General Counsel; (c) Weil Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153, Attn: Richard P. Krasnow, Esq., Lori R. Fife, Esq., Shai Y. Waisman, Esq., and Jacqueline Marcus, Esq. and Jones Day, 222 East 41st Street, New York, New York 10017, Attn: Robert W. Gaffey, Esq., William J. Hine, Esq., and Jayant W. Tambe, Esq., Counsel to the Lehman Brothers Holdings Inc. and affiliated debtors (collectively, "LBHI"); (d) Milbank, Tweed, Hadley & McCloy LLP, One Chase Manhattan Plaza, New York, New York 10005, Attn: Dennis F. Dunne, Esq., Dennis O'Donnell, Esq., and Evan Fleck, Esq. and Quinn Emanuel Urquhart Oliver & Hedges, LLP, 51 Madison Avenue, 22nd Floor, New York, New York 10010, Attn: Susheel Kirpalani, Esq. and James C. Tecce, Esq., Counsel to the Official Committee of Unsecured Creditors appointed in the LBHI

proceeding; and (e) Boies, Schiller & Flexner LLP, 575 Lexington Avenue, 7th Floor, New York, New York 10022, Attn: Jonathan D. Schiller, Esq., Hamish P.M. Hume, Esq., and Jack G. Stern, Esq., Counsel to Barclays Capital Inc., with a courtesy copy to the chambers of the Honorable James M. Peck, United States Bankruptcy Court, Alexander Hamilton Customs House, Courtroom 601, One Bowling Green, New York, New York 10004. Unless objections are received by the Objection Deadline, the relief requested in the Motion shall be deemed unopposed, and the Bankruptcy Court may enter an order granting the relief sought without a hearing.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held before the Honorable James M. Peck, United States Bankruptcy Judge, at the United States Bankruptcy Court, Alexander Hamilton Customs House, Courtroom 601, One Bowling Green, New York, New York 10004 (the “Bankruptcy Court”), on **October 15, 2009 at 2:00 p.m.** (prevailing Eastern time) or as soon thereafter as counsel may be heard (the “Hearing”).

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: New York, New York  
September 15, 2009

HUGHES HUBBARD & REED LLP

By: /s/ William R. Maguire  
William R. Maguire

Seth D. Rothman  
Neil J. Oxford  
One Battery Park Plaza  
New York, New York 10004  
(212) 837-6000 (telephone)  
(212) 422-4726 (facsimile)  
[maguire@hugheshubbard.com](mailto:maguire@hugheshubbard.com)

John F. Wood (*pro hac vice* admission pending)  
1775 I. Street, N.W.  
Washington D.C., 20006  
(202) 721-4600 (telephone)  
(202) 721-4646 (facsimile)  
[woodj@hugheshubbard.com](mailto:woodj@hugheshubbard.com)

Attorneys for James W. Giddens, as  
Trustee for the SIPA Liquidation of  
Lehman Brothers Inc